

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ASIAN AMERICANS
ADVANCING
JUSTICE-ATLANTA, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as the Georgia
Secretary of State, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:21-CV-01333-JPB

WAIVER OF SERVICE FOR COUNTY DEFENDANTS

The following Defendants, collectively representing the various County Boards of Elections and Registrations, along with all County Election Officials named as parties to this action (hereinafter the “County Defendants”), by their undersigned attorneys, reserve all defenses or objections to the lawsuit, the court’s jurisdiction, and the venue of the action, but waive any objections to the absence of a summons or of service of the summons and First Amended Complaint [Doc. 27].

1) FULTON COUNTY REGISTRATION AND ELECTIONS BOARD, ALEX WAN, MARK WINGATE, KATHLEEN D. RUTH, VERNETTA K. NURIDDIN, and AARON V. JOHNSON, Members of the Fulton County Registration and

Elections Board, in their official capacities, RICHARD L. BARRON, Director of the Fulton County Registrations and Elections board, in his official capacity (collectively the “Fulton County Defendants”),

2) DEKALB COUNTY BOARD OF REGISTRATIONS AND ELECTIONS, ANTHONY LEWIS, SUSAN MOTTER, DELE L. SMITH, SAMUEL E. TILLMAN, and BAO KY N. VU, Members of the DeKalb County Board of Registrations and Elections, in their official capacities, ERICA HAMILTON, Director of Voter Registration and Elections in DeKalb County, in her official capacity (collectively the “DeKalb County Defendants”),

3) GWINNETT COUNTY BOARD OF REGISTRATIONS AND ELECTIONS, ALICE O’LENICK, WANDY TAYLOR, STEPHEN W. DAY, GEORGE AWUKU, and SANTIAGO MARQUEZ,¹ Members of the Gwinnett County Board of Registrations and Elections, in their official capacities, KELVIN WILLIAMS,² Director of the Gwinnett County Board of Registrations and Elections, in his official capacity (collectively the “Gwinnett County Defendants”),

¹ Plaintiffs have filed an Unopposed Motion to Substitute Party John Doe for Santiago Martinez [Doc. 37], which remains pending.

² Plaintiffs filed a Consent Motion to Substitute Kelvin Williams for Lynn Ledford [Doc. 35], which remains pending. Ms. Ledford is no longer the Director of the Gwinnett County Board of Registrations and Elections, has not been served in this action, and does not waive service of process.

4) COBB COUNTY BOARD OF ELECTIONS AND REGISTRATION, PHIL DANIELL, FRED AIKEN, PAT GARTLAND, JESSICA M. BROOKS, and DARYL O. WILSON, JR., Members of the Cobb County Board of Elections and Registration, in their official capacities, JANINE EVELER, Director of the Cobb County Board of Elections and Registration, in her official capacity (collectively the “Cobb County Defendants”),

5) CLAYTON COUNTY BOARD OF ELECTIONS AND REGISTRATION, DARLENE JOHNSON, DIANE GIVENS, CAROL WESLEY, DOROTHY F. HALL, and PATRICIA PULLAR, Members of the Clayton County Board of Elections and Registration, in their official capacities, SHAUNA DOZIER, Clayton County Elections Director, in her official capacity (collectively the “Clayton County Defendants”), and

6) FORSYTH COUNTY BOARD OF VOTER REGISTRATIONS AND ELECTIONS, BARBARA LUTH, MATTHEW BLENDER, JOEL NATT, CARLA RADZIKINAS, and RANDY INGRAM, Members of the Forsyth County Registrations and Elections Board, in their official capacities, MANDI B. SMITH, Director of the Forsyth County Board of Elections and Registration in her official capacity (collectively the “Forsyth County Defendants”).

The Parties have agreed that the County Defendants will have until July 12, 2021 to respond to the First Amended Complaint and will file a motion seeking an order from the Court to set that date.

Respectfully submitted this 30th day of June, 2021.

DEKALB COUNTY BOARD OF REGISTRATIONS AND ELECTIONS, ANTHONY LEWIS, SUSAN MOTTER, DELE L. SMITH, SAMUEL E. TILLMAN, and BAO KY N. VU, Members of the DeKalb County Board of Registrations and Elections, in their official capacities;

By: **DEKALB COUNTY LAW DEPARTMENT**

/s/ Irene B. Vander Els

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BY: **HAYNIE, LITCHFIELD & WHITE, PC**

/s/ Daniel W. White

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By: **GWINNETT COUNTY LAW DEPARTMENT**

/s/ Tuwanda Rush Williams

Tuwanda Rush Williams

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DARLENE JOHNSON, DIANE GIVENS, CAROL WESLEY, DOROTHY F.
HALL, and PATRICIA PULLAR, Members of the Clayton County Board of
Elections and Registration, in their official capacities, SHAUNA DOZIER, Clayton
County Elections Director, in her official capacity;

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Registrations and Elections Board, in their official capacities, MANDI B. SMITH,
Director of the Forsyth County Board of Elections and Registration in her official
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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of L.R. 5.1, using the font type of Times New Roman and a point size of 14.

Dated: June 30, 2021

/s/ Irene B. Vander Els
Irene B. Vander Els